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ADMITTED IN NY & NJ

January 6, 2017

BYECF

Hon. Katherine B. Forrest United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 USDC SDNY
DOCUMENT
ELECTROBICALLY FILED
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Re: U.S. v. Darcy Wedd, 15 CR 616 (KBF)

Your Honor:

I write seeking modification of Mr. Wedd's bail conditions. Specifically, I request permission for him to travel to Hilton Head, South Carolina, from Jan. 14-17, 2017.

Background

On Sept. 14, 2015, an indictment was unsealed and Mr. Wedd voluntarily surrendered to the U.S. Marshal's Service. Presentment next occurred before Magistrate Judge Ellis. Mr. Wedd was released on an appearance bond, with terms including:

Mr. Wedd signed a \$500,000 personal recognizance bond.

The bond was co-signed by two financially responsible persons.

The bond was further secured by property with an equity value of \$500,000.

Travel was limited to the Southern and Eastern Districts of New York, the Central District of California, the District of Nevada, and travel points in between.

Mr. Wedd, a non-citizen, surrendered his travel documents and was to make no application for new documents.

He was to be supervised by Pretrial Services in the Central District of California.

On Dcc. 16, 2015, the Court modified the bail conditions. From that point forward, Mr. Wedd was to report to Pretrial Services in New York, once per week by phone and once per month in person. Mr. Wedd was permitted to travel between the Southern and Eastern Districts of New York, the Central District of California, and the District of Nevada, with Pretrial Services' approval and notification to the U.S. Attorney's Office.

The Instant Application

Mr. Wedd requests permission to travel to Hilton Head, South Carolina, to visit his girlfriend's family. He hopes to fly from New York to Hilton Head on Jan. 14, 2017, returning on the 17th. Mr. Wedd hopes to stay at his girlfriend's sister's house in Hilton Head. The address has already been provided to government and U.S. Pretrial Services. Indeed, both Pretrial Officer Tiffany Francis and AUSA Richard Cooper consent to this application.

Conclusion

cc:

I respectfully ask the Court to modify Mr. Wedd's bail conditions, permitting the above described travel.

Most respectfully,

/S/

Robert Caliendo, Esq.

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AUSA Richard Cooper (by ECF)

Tiffany Francis, U.S. Pretrial Officer (by email)